

Honorable Benjamin H. Settle
Honorable Ronald B. Leighton

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,
Plaintiff,
v.
CARLOS LOPEZ HERNANDEZ, et al.,
Defendants.

CASE NO. CR18-5579RBL

NOTICE OF RELATED CASES

UNITED STATES OF AMERICA,
Plaintiff,
v.
ALLEX HUBLY
and
DAVID JOZEPH HUBLY,
Defendants.

NO. CR18-5591BHS

NOTICE OF RELATED CASES

Comes now the United States of America, by Annette L. Hayes, United States Attorney for the Western District of Washington, and Marci L. Ellsworth and Karyn S. Johnson, Assistant United States Attorneys for said District, and respectfully submits the following Notice of Related Cases pursuant to Local Criminal Rule 13(a) and (b).

The two cases captioned above are related cases.

On November 29, 2018, the Grand Jury charged 31 members of a large drug trafficking organization (DTO) with one count of Conspiracy to Distribute Controlled Substances, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)

NOTICE OF RELATED CASES

United States v. Hernandez et al, CR18-5579RBL

United States v. Hubly et al, CR18-5591BHS – 1

UNITED STATES ATTORNEY
1201 PACIFIC AVENUE, SUITE 700
TACOMA, WASHINGTON 98402
(253) 428-3800

1 and 846 (Count 1), and some of those 31 individuals in two related money laundering
 2 counts, in case number CR18-5579RBL. Agents arrested many of the 31 indicted
 3 defendants on December 5-6, 2018, during a coordinated takedown of the investigation.
 4 Two arrests occurred in Oregon and Nevada; those defendants have yet to make their
 5 initial appearances in this District.

6 The coordinated takedown was the culmination of a year-plus long investigation
 7 conducted by the Drug Enforcement Administration that involved several periods of
 8 court-authorized wiretaps. In addition to obtaining the Indictment against the 31
 9 individuals on November 29, 2018, agents also swore to a number of criminal complaints
 10 on December 4, 2018, and obtained arrest warrants for those individuals. During the
 11 takedown on December 5-6, 2018, agents also arrested a number of individuals on
 12 probable cause. Agents made *all* of these arrests as a part of the larger investigation.
 13 Additionally, there is a single search warrant affidavit underlying nearly every search
 14 made during the takedown. Even where agents swore to a different affidavit, it
 15 incorporated much of the same information as was contained in the large, single affidavit,
 16 all of which is the same information contained in the wiretap pleadings.

17 Due the overlap between the two cases (CR18-5579RBL and CR18-5591BHS),
 18 including common co-conspirator defendants and the common facts underlying both
 19 indictments, the United States files this notice to the Court of the related cases and
 20 requests the new case, CR18-5591BHS, be reassigned to Judge Ronald B. Leighton.

21 DATED this 14th day of December, 2018.

22 Respectfully submitted,

23 ANNETTE L. HAYES
 24 UNITED STATES ATTORNEY

25 /s/ Marci L. Ellsworth
 26 MARCI L. ELLSWORTH
 27 KARYN S. JOHNSON
 28 Assistant United States Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorney of record for the defendant.

/s/ Lisa Crabtree

LISA CRABTREE

Paralegal

United States Attorney's Office

1201 Pacific Avenue, Suite 700

Tacoma, Washington 98402

Telephone: (253) 428-3800

Fax: (253) 428-3826

E-mail: Lisa.Crabtree@usdoj.gov